

****FILED****

12:14 pm, Jan 26, 2021

RTP:OO
F. #2020R01144

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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1:21-cr-00063(FB)(VMS)

UNITED STATES OF AMERICA

SUPERSEDING
INDICTMENT

- against -

STANLEY DANIEL and MAURICE
WILLIAMS,

Defendants.

Cr. No. 21-63 (S-1) (FB)
(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(c)(1)(A)(i), 924(c)(1)(A)(ii),
924(d)(1), 981(a)(1)(C), 1951(a), 2 and
3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

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THE GRAND JURY CHARGES:

COUNT ONE
(Hobbs Act Robbery)

1. On or about November 15, 2020, within the Eastern District of New York, the defendants STANLEY DANIEL and MAURICE WILLIAMS, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency and cellular telephones from a cellular telephone warehouse located at 37-47 73rd Street in Queens, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT TWO
(Possessing and Brandishing a Firearm During a Crime of Violence)

2. On or about November 15, 2020, within the Eastern District of New York, the defendants STANLEY DANIEL and MAURICE WILLIAMS, together with others, did knowingly and intentionally use and carry one or more firearms during and in

relation to a crime of violence, to wit: the crime charged in Count One, and did knowingly and intentionally possess such firearms in furtherance of said crime of violence, one or more of which firearms were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

COUNT THREE

(Felon in Possession of a Firearm and Ammunition)

3. On or about December 16, 2020, within the Eastern District of New York, the defendant STANLEY DANIEL, knowing that he had previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm and ammunition, to wit: one Charter Arms Undercover .38 caliber revolver, two .38 caliber cartridges and three .38 caliber cartridge casings.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

4. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any other criminal law of the United

States, including but not limited to: (i) one Charter Arms Undercover .38 caliber revolver; (ii) two .38 caliber cartridges; and (iii) three .38 caliber cartridge casings seized from the defendant STANLEY DANIEL on or about December 16, 2020, in Brooklyn, New York.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWO AND THREE

6. The United States hereby gives notice to the defendants charged in Counts Two and Three that, upon their conviction of either of the offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code,

Section 922 or Section 924, including, but not limited to: (i) one Charter Arms Undercover .38 caliber revolver; (ii) one .38 caliber cartridge; and (iii) three .38 caliber cartridge casings seized from the defendant STANLEY DANIEL on or about December 16, 2020, in Brooklyn, New York.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON

JACQUELYN M. KASULIS
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

By:


Assistant U.S. Attorney

F. #2020R01144
FORM DBD-34
JUN. 85

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

STANLEY DANIEL and MAURICE WILLIAMS,
Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(c)(1)(A)(i), 924(c)(1)(A)(ii),
924(d)(1), 981(a)(1)(C), 1951(a), 2 and 3551 et seq.; T. 21, U.S.C., §
853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Dubravka Savardel

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Olatokunbo Olaniyan, Assistant U.S. Attorney (718) 254-6317